

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

*Breathitt County Board of Education v. Meta
Platforms, Inc., et al.*

*Tucson Unified School District v. Meta Platforms,
Inc., et al.*

*Charleston County School District v. Meta
Platforms, Inc., et al.*

*Irvington Public Schools v. Meta Platforms, Inc., et
al.*

*Dekalb County School District v. Meta Platforms,
Inc., et al.*

*Board of Education of Harford County v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**STIPULATION AND [PROPOSED]
ORDER TO RETAIN TEMPORARY
SEALING OF INCORRECTLY
PUBLICLY FILED DOCUMENTS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

STIPULATION

The School District Plaintiffs request that the Court order that the attachments to ECF Nos. 2554 and 2555 (except 2554-34 and 2555-47) (the “Documents”) remain temporarily sealed. The Defendants impacted by this issue agree to this request.

The Documents are exhibits to the School District Plaintiffs’ Omnibus Opposition to Defendants’ Motions for Summary Judgment,¹ re-filed as excerpts pursuant to CMO No. 30 (ECF No. 2549). Pursuant to the School District Plaintiffs’ Temporary Sealing Motion (ECF No. 2414), the Documents should have been (and were attempted to be) filed temporarily under seal, as they contain information that one or more of the Defendants have designated Confidential or Highly Confidential under the Protective Order in this case. While the Documents were filed as related to the School District Plaintiffs’ Temporary Sealing Motion (ECF 2414), they were incorrectly designated during the filing process as “Exhibits” to the Temporary Sealing Motion rather than as “Attachments to Administrative Motion to File Under Seal,” resulting in them being erroneously filed on the public docket.

The School District Plaintiffs notified Defendants immediately upon discovering this error and took all steps outlined on the Northern District of California’s “CM/ECF Support and Troubleshooting” website to rectify the problem. The Documents have been temporarily sealed by the Court’s ECF Clerk and, at present, correctly appear on the docket as “currently Under Seal and not available to the general public.” The School District Plaintiffs and the Defendants impacted by this issue respectfully ask that the Court ORDER that the Documents remain temporarily sealed.

The School District Plaintiffs and the Defendants impacted by this issue also respectfully request that the Court ORDER that any Party, counsel, or member of the public who may have obtained copies of the Documents during the approximately three hours that they were publicly available, including through ECF Court alerts that automatically generate PDF copies of documents filed in the case, immediately delete and destroy them.

¹ ECF No. 2354 (original), ECF No. 2414-1 (corrected), ECF No. 2480 (lesser-redacted).

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The attachments to ECF Nos. 2554 and 2555 (other than 2554-34 and 2555-47) (the “Documents”) shall remain temporarily sealed.

Any Party, counsel, or member of the public who may have obtained copies of the Documents during the approximately three hours that they were publicly available, including through ECF Court alerts that automatically generate PDF copies of documents filed in the case, shall immediately delete and destroy them.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE
Respectfully submitted,

1 Date: December 17, 2025

2 By: /s/ Previn Warren
3 PREVIN WARREN
4 **MOTLEY RICE LLC**
5 401 9th Street NW Suite 630
6 Washington DC 20004
7 Telephone: 202-386-9610
8 pwarren@motleyrice.com

9 LEXI J. HAZAM
10 **LIEFF CABRASER HEIMANN &**
11 **BERNSTEIN, LLP**
12 275 BATTERY STREET, 29TH FLOOR
13 SAN FRANCISCO, CA 94111-3339
14 Telephone: 415-956-1000
15 lhazam@lchb.com

16 *Co-Lead Counsel for School District Plaintiffs*

17 By: /s/ Ashley M. Simonsen
18 Ashley M. Simonsen, SBN 275203
19 **COVINGTON & BURLING LLP**
20 One City Center
21 850 Tenth Street, NW
22 Washington, DC 20001-4956
23 Tel: (424) 332-4800

24 Phyllis A. Jones, *pro hac vice*
25 Paul W. Schmidt, *pro hac vice*
26 **COVINGTON & BURLING LLP**
27 One City Center
28 850 Tenth Street NW
Washington, DC 20001-4956
Tel: (202) 662-6000

*Attorneys for Defendants Meta Platforms, Inc.,
Facebook Holdings, LLC, Facebook Operations, LLC,
Facebook Payments, Inc., Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

FILER'S ATTESTATION

I, Previn Warren, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 17, 2025

By: /s/ Previn Warren